

1  
2                   UNITED STATES DISTRICT COURT  
3                   NORTHERN DISTRICT OF CALIFORNIA  
4                   (SAN FRANCISCO DIVISION)

5  
6 IN RE: VIAGRA (SILDENAFIL CITRATE)  
7 AND CIALIS (TADALAFIL) PRODUCTS  
8 LIABILITY LITIGATION

Case No.: 3:16-md-02691-RS  
MDL No. 2691

9  
10 ROGER KREGE,

Case No:

11                   Plaintiff,

**Master Short Form Complaint**

12 v.

13 PFIZER INC.,

14                   Defendant.

15 Plaintiff, ROGER KREGE, incorporates by reference the Plaintiffs' Master Long Form  
16 Complaint(s) filed with United States District Court for the Northern District of California in  
17 the matter of *In re: Viagra (Sildenafil Citrate) and Cialis (Tadalafil) Products Liability  
Litigation*. Plaintiff further shows the court as follows:

18 1. Defendant(s) against whom Complaint is made:

19       a.  Eli Lilly and Company

20       b.  Pfizer Inc.

21       c.  Other (specify Defendant) \_\_\_\_\_

22 2. Plaintiff's Full Name:

23       a. Roger Krege

24 3. Name of the party or deceased who ingested Viagra/Revatio (sildenafil citrate) (hereinafter  
25 "Viagra") and/or Cialis/Adcirca (tadalafil) (hereinafter "Cialis") and suffered injury, if  
different than Plaintiff:

26       a. N/A

4. Name of additional or other Plaintiff, including loss of consortium Plaintiff(s) (i.e. administrator, executor, guardian, conservator):

a. N/A

5. Plaintiff's current city and state of residence:

a. Joplin, Missouri

6. District Court in which venue would be proper absent direct filing:

a. Western District of Missouri

7. City and state of Plaintiff or Decedent when he/she was diagnosed with melanoma:

a. Joplin, Missouri

8. Approximate dates that the Plaintiff or Decedent ingested Viagra (if applicable):

a. Start date: 06/08/2012

b. Stop date: 07/08/2012

9. Approximate dates that the Plaintiff or decedent ingested Cialis (if applicable):

a. Start date: \_\_\_\_\_ N/A

b. Stop date: N/A

10. Date(s) that Plaintiff was diagnosed with melanoma which he/she alleges was caused by  
Viagra and/or Cialis:

a. 01/01/2016

**11. Date of death of Decedent, if applicable:**

a.        N/A

12. Master Complaint Adopted (check one or both):

a. X Pfizer Master Complaint

b.  Eli Lilly Master Complaint

13. Counts in the Master Complaint(s) brought by Plaintiff(s):

a. Count 1 (Negligence): X

b. Count 2 (Gross Negligence):  X

c. Count 3 (Negligence Per Se): X

- 1 d. Count 4 (Unfair and Deceptive Trade Practices: Unfairness) X
- 2 e. Count 5 (Unfair and Deceptive Trade Practices: Fraud) X
- 3 f. Count 6 (Unfair and Deceptive Trade Practices: Unlawfulness) X
- 4 g. Count 7 (Strict Liability – Defective Design): X
- 5 h. Count 8 (Strict Liability – Failure to Warn): X
- 6 i. Count 9 (Failure to Test): X
- 7 j. Count 10 (Breach of Express Warranty): X
- 8 k. Count 11 (Breach of Implied Warranty): X
- 9 l. Count 12 (Fraudulent Misrepresentation and Concealment): X
- 10 m. Count 13 (Negligent Misrepresentation and Concealment): X
- 11 n. Count 14 (Fraud and Deceit): X
- 12 o. Count 15 (Willful, Wanton, and Malicious Conduct): X
- 13 p. Count 16 (Unjust Enrichment): X
- 14 q. Count 17 (Loss of Consortium): \_\_\_\_\_
- 15 r. Count 18 (Survival): \_\_\_\_\_
- 16 s. Count 19 (Wrongful Death): \_\_\_\_\_
- 17 t. Count 20 (Punitive Damages): X
- 18 u. Other: \_\_\_\_\_

19 14. Jury Demand

- 20 a. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demand a trial  
21 by jury as to all claims in this action: Yes X No \_\_\_\_\_

22  
23 Dated this the 22nd day of January, 2020.

Respectfully submitted on behalf of the Plaintiff,

  
\_\_\_\_\_  
Jennifer Liakos (CA SBN 207487)  
Hunter J. Shkolnik (*Pro Hac Vice Pending*)  
Napoli Shkolnik PLLC  
(310) 331-8224 (Phone)  
(646) 843-7603 (Facsimile)  
Email: [jliakos@NapoliLaw.com](mailto:jliakos@NapoliLaw.com)  
Email: [hshkolnik@NapoliLaw.com](mailto:hshkolnik@NapoliLaw.com)